

THE HONORABLE RONALD B. LEIGHTON

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

LEONARD PELTIER, CHANCEY  
PELTIER,

Plaintiffs,

v.

JOEL SACKS, individually and in his  
capacity as DIRECTOR OF the  
WASHINGTON STATE  
DEPARTMENT OF LABOR AND  
INDUSTRIES; TIMOTHY CHURCH,  
individually and in his capacity as  
PUBLIC AFFAIRS MANAGER of the  
WASHINGTON STATE  
DEPARTMENT OF LABOR AND  
INDUSTRIES; JAY INSLEE,  
individually and in his capacity as  
GOVERNOR OF THE STATE OF  
WASHINGTON; EDWARD P.  
WOODS; LARRY LANGBERG;  
DOES 1-200,

Defendants.

Case No.: 3:17-cv-05209-RBL

**DECLARATION OF EDWARD WOODS  
IN SUPPORT OF ATTORNEY FEE  
AWARD**

**Motion Noted: August 11, 2017**

I, EDWARD WOODS, make the following statement under oath subject to penalty of perjury  
under the laws of the State of Washington and the United States:

1.1 I make this declaration based on personal knowledge, and my education, training, and experience, and my familiarity with the files and records in these proceedings.

1.2 I retained III Branches Law, PLLC to represent me in the above referenced matter on or about May 16, 2017.

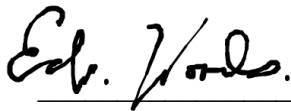
1.3 I signed a retainer agreement obligating me to compensate III Branches Law, PLLC at the rate of \$375.00 per hour for my time and \$175.00 per hour for paralegal time.

1.4 I have incurred a total obligation in attorney's fees of \$3,450.00 to III Branches Law, PLLC as set forth in Ex. A to the Mell Declaration. I know my attorney has incurred additional time in preparation of this motion and would expect to recover that amount as well, which I expect is around \$500.00.

1.5 I believe these fees to be both reasonable and necessarily incurred in my defense.

1.6 Ms. Mell was efficient with her time, and worked in tandem with the other attorneys to limit my expenses.

Dated this 1st day of August, 2017 at Fircrest, WA.



Edward Woods

**CERTIFICATE OF SERVICE**

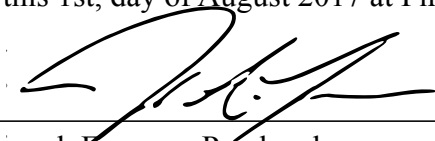
I, Joseph Fonseca, hereby certify as follows:

I am over the age of 18, a resident of Pierce County, and not a party to the above action. On August 1, 2017, I electronically filed the above EDWARD WOODS' DECLARATION, with the Clerk of the Court using the CM/ECF system and served via Email to the following:

ATTORNEY NAME & ADDRESS	METHOD OF DELIVERY
Lawrence A. Hildes Law Offices of Lawrence A. Hildes P.O. Box 5405 Bellingham, Washington 98227 lhildes@earthlink.net	■ CM/ECF E-Service ■ E-mail
Peter J. Helmberger Office of the Attorney General 1250 Pacific Avenue, Suite 105 Tacoma, Washington, WA 98401	
Kyle D. Riley Jeremy H. Rogers Smith, Freed & Eberhard, P.C. 705 Second Avenue, Suite 1700 Seattle, WA 98104 kriley@smithfreed.com jrogers@smithfreed.com	

I certify under penalty of perjury under the laws of the State of Washington that the above information is true and correct.

DATED this 1st, day of August 2017 at Fircrest, Washington.

  
\_\_\_\_\_  
Joseph Fonseca, Paralegal